

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Agency Interest No. 1468
Activity No.: PER20090017

Mr. Eric Phillips
Rubicon LLC
Post Office Box 517
Geismar, LA 70734

RE: Part 70 Operating Permit Renewal/Modification, Polyols Plant
Rubicon LLC, Geismar, Ascension Parish, Louisiana

Dear Mr. Phillips:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2015, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and Agency Interest No. cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2010.
Permit No.: 2010-V1

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN:TVN

c: EPA Region VI

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

POLYOLS PLANT
RUBICON LLC, AI NO. 1468
GEISMAR, ASCENSION PARISH, LOUISIANA

I. Background

Rubicon LLC is located on the east bank of the Mississippi River in Ascension Parish, approximately one mile southeast from the town of Geismar, Louisiana. The Rubicon facility is composed of a number of chemical manufacturing plants and has been in operation since 1966. Currently, the Polyols Plant operates under Permit No. 2010-V0, issued December 28, 2004 and Administrative Amendment, issued April 18, 2005.

This is the Part 70 operating permit for the facility.

II. Origin

A permit application dated June 24, 2009 was submitted requesting a Part 70 operating permit renewal/modification.

III. Description

Polyols are a family of hydroxyl-terminated polyethers or hydroxyl-terminated polyesters, which are reacted with isocyanates to form polyurethane. The polyols plant produces various grades of polyols and polyol blends for shipment off-site. The primary products are flexible polyols, rigid polyols, and PIPA polyols.

An alcohol or amine is reacted with propylene oxide to produce hydroxyl polyol. Depending upon the desired product, ethylene oxide is then added. The basic polyol is then neutralized, dewatered, filtered and shipped to polyol storage. PIPA is produced by the reaction of an amine and methylene diphenyl diisocyanate (MDI) in a polyol solution to produce a polyurethane slurry.

The various classes of polyols are blended with additives to control and modify the polyurethane reaction and the polyurethane properties.

In this renewal/modification, Rubicon proposes to include following changes:

- Change of tank service for Tank MS-7071 (an insignificant activity) from Dibasic Ester Storage to Fyrol PCF service;
- Update fugitive emissions (Point Source UP, Fug11) based on fugitive emissions calculation methodology;
- Update DELA Storage Tank MS-7059 (Point source TG, EQT93) based on the most recent EPA TANKS program (Version 4.0.9D); and
- Add three insignificant activities: IA-5 - Acid Soap Tote, IA-6 - Caustic Soap

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Tote and IA-7 - Waste Polyols Tote.

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	3.85	3.85	-
SO ₂	0.07	0.07	-
NO _x	30.82	30.82	-
CO	9.92	9.92	-
VOC	10.36	10.36	-
Cl ₂	0.001	0.001	-

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
2,4-Toluene Diamine	0.02	0.02	-
Diethanolamine	-	0.12	+0.12
Ethylene Glycol	-	0.11	+0.11
Ethylene Oxide	0.03	0.24	+0.21
Methylene Diphenyl Diisocyanate	0.01	0.05	+0.04
Propylene Oxide	0.32	0.80	+0.48
Total TAP's	0.38	1.34	+0.96
Other VOC	9.90	9.02	-0.88

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and NESHAP. Prevention of Significant Deterioration (PSD) and Non-attainment New Source Review (NNSR) do not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

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V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: None

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VIII. General Condition XVII Activities

ID No.	Description
GC-1	Process Filter Changes
GC-2	Solid Chemical Additions to the Process
GC-3	Sucrose System Cleaning
GC-4	Vessel Preparation

IX. Insignificant Activities

ID No.	Description	Citation
IA-1	Demount Tanks, 6340 gallons/each	LAC 33:III.501.B.5.A.3
IA-2	Polyols Rework Drum, 55 gallons	LAC 33:III.501.B.5.A.3
IA-3	Irganox Addition Pot GF-7078, 12 gallons	LAC 33:III.501.B.5.A.3
T6	Additive Tank MS-7070, 93 gallons	LAC 33:III.501.B.5.A.3
TC	PIPA Dilution Vessel MS-7068, 1871 gallons	LAC 33:III.501.B.5.A.3
TH	Acetic Acid Storage Tank MS-7046, 5707 gallons	LAC 33:III.501.B.5.A.3
TJ	Brine Storage Tank MS-7017, 110 gallons	LAC 33:III.501.B.5.A.3
TL	Additive Tank MS-7069, 93 gallons	LAC 33:III.501.B.5.A.3
TO	Glycerol Storage Tank MS-7013, 7638 gallons	LAC 33:III.501.B.5.A.3
TP	Diethylene Glycol Storage Tank MS-7011, 7638 gallons	LAC 33:III.501.B.5.A.3
TQ	Dipropylene Glycol Storage Tank MS-7044, 6187 gallons	LAC 33:III.501.B.5.A.3
TR	Test Tank A MS-7056C, 6463 gallons	LAC 33:III.501.B.5.A.3
TS	Test Tank B MS-7056D, 6463 gallons	LAC 33:III.501.B.5.A.3
UC	Slurry Tank MS-7027, 800 gallons	LAC 33:III.501.B.5.A.3
UE	Test Tank A MS-7056A, 6463 gallons	LAC 33:III.501.B.5.A.3
UF	Test Tank B MS-7056B, 6463 gallons	LAC 33:III.501.B.5.A.3
UK	Slurry Tank MS-7051, 734 gallons	LAC 33:III.501.B.5.A.3
UQ	Drum Loading Activities, 55 gallons/each	LAC 33:III.501.B.5.A.3
UW	TELA 99 Storage Tank MF-7077, 7638 gallons	LAC 33:III.501.B.5.A.3
IA-4	Fyrol PCF Storage Tank MS-7071, 7144 gallons	LAC 33:III.501.B.5.A.3
IA-5	Acid Soap Tote	LAC 33:III.501.B.5.A.3
IA-6	Caustic Soap Tote	LAC 33:III.501.B.5.A.3
IA-7	Waste Polyols Tote	LAC 33:III.501.B.5.A.3

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X. Specific Conditions

Permittee shall comply with streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emission programs.

- a. Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (63 Subpart H-HON) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.
- b. Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
- c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31, to cover the periods January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Unit or Plant Site	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
Polyols Plant	Non HON MACT	5% VOTAP	40 CFR 63 Subpart H – HON
	40 CFR 63 Subpart H	5% VOHAP	
	LAC 33:2122	10% VOC	
	40 CFR 60 Subpart VV	10% VOC	
	40 CFR 63 Subpart PPP		

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
POLYOLS PLANT
RUBICON LLC, AI NO. 1468
GEISMAR, ASCENSION PARISH, LOUISIANA

XI. Applicable Louisiana Air Quality Requirements

ID No.:	Description	LAC 33:III, Chapter																			
		9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2149	2153	22	29	51	52	56	59	
UNF007	Polyols Plant	1							1	1											
EQT89	Vent Incinerator GI-7000 (EQI TA)		1	2	2																
EQT90	Effluent Concentrator Vessel MS-7033 (EQI TB)					2							2								
EQT92	PIPA Reactor MR-7065 (EQI TF)										2										
EQT93	DELA Storage Tank MS-7059 (EQI TG)					2															
EQT95	Blender Vent GB-7002 (EQI TI)									2											
EQT98	Storage Tank MF-7003 (EQI TM)					2															
EQT99	Diisocyanate Storage Tank MF-7063 (EQI TN)					2										1					
EQT105	Product Storage Tank MF-7042A (EQI TT)					2															
EQT106	Product Storage Tank MF-7042B (EQI TU)					2															
EQT107	Test Tank MS-7032A (EQI TW)					2															
EQT108	Test Tank MS-7032B (EQI TX)					2															
EQT109	Test Tank MS-7032C (EQI TY)					2															
EQT110	Product Storage Tank MF-7035A (EQI TZ)					2															
EQT111	Product Storage Tank MF-7035B (EQI T1)					2															
EQT112	Product Storage Tank MF-7035C (EQI T2)					2															
EQT113	Product Storage Tank MF-7035D (EQI T3)					2															
EQT114	Product Storage Tank MF-7035E (EQI T4)					2															
EQT115	Product Storage MF-7061 (EQI T5)					2															
EQT121	Product Storage Tank MF-7043A (EQI UG)					2															
EQT122	Product Storage Tank MF-7043B (EQI UH)					2															
EQT124	Silo MS-7038 (EQI UL)			1																	
EQT125	Process Effluent Tank MF-7021 (EQI UM)					2															
EQT126	Rainwater Effluent Tank MF-7020 (EQI UN)					2															
EQT127	Concentrated Effluent Tank MF-7033 (EQI UO)					2															

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ID No.:	Description	LAC 33:III, Chapter																			
		9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2149	2153	22	29	51	52	56	59	
EQT143	Rigid Blender MR-7069					2															
EQT144	Quench Water Collection Tank MS-7001					2															
Reactor Systems																					
EQT145	1 st Stage Reactor MR-7015 (GRP 25)										2		2							1	
EQT146	2 nd Stage Reactor MR-7019 (GRP 25)										2		2							1	
EQT147	3 rd Stage Reactor MR-7023 (GRP 25)										2		2							1	
EQT148	Dehydration Tank MS-7030 (GRP 25)										2		2							1	
EQT149	Sucrose Reactor MR-7049 (GRP 25)										2		2							1	
EQT150	Amine Reactor MR-7050 (GRP 25)										2		2							1	
Heat Exchange Systems																					
EQT186	Chiller TT-7004																				
EQT187	Chiller TT-7005																				
EQT188	Chiller TT-7006																				
EQT189	Chiller TT-7007																				
EQT151	Condenser PV-7000-02																				
EQT152	Condenser PV-7001-02																				
EQT153	Condenser PV-7002-02																				
EQT154	Condenser PV-7003-02																				
EQT155	Condenser GR-7000																				
EQT156	Condenser GR-7001-05																				
EQT157	Vacuum System Condenser PV-7036-02																				
EQT158	Vacuum System Condenser PV-7037-02																				
EQT159	Oil Cooler PV-7000-06																				
EQT160	Oil Cooler GB-7000-03																				
EQT161	Oil Cooler PV-7001-06																				

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 POLYOLS PLANT
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XI. Applicable Louisiana Air Quality Requirements		LAC 33:III.Chapter																			
		9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2149	2153	22	29	51	52	56	59	
ID No.:	Description																				
EQT162	Oil Cooler PV-7002-06																				
EQT190	Oil Cooler PV-7003-06																				
EQT163	Oil Cooler PV-7036-06																				
EQT164	Oil Cooler PV-7037-06																				
EQT165	Oil Cooler GR-7001-04																				
EQT191	Cooler TT-7015																				
EQT192	Cooler TT-7017																				
EQT166	Water Cooler TT-7018																				
EQT193	Cooler TT-7019																				
EQT194	Cooler TT-7021																				
EQT171	Tempered Water Cooler TT-7022																				
EQT195	Cooler TT-7023																				
EQT196	Cooler TT-7024																				
EQT167	Water Cooler TT-7025																				
EQT197	Cooler TT-7033																				
EQT168	Cooler TT-7034																				
EQT198	Cooler TT-7036																				
EQT199	Cooler TT-7037																				
EQT172	Sucrose Tempered Water Cooler TT-7053																				
EQT200	Cooler TT-7054																				
EQT201	Cooler TT-7055																				
EQT170	Cooler TT-7056																				
EQT169	Cooler TT-7057																				
EQT173	Amine Product Cooler TT-7058																				
EQT202	Cooler TT-7066																				

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ID No.:	Description	LAC 33:III. Chapter																		
		9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2149	2153	22	29	51	52	56	59
EQT203	Cooler TT-7069																			
EQT204	Cooler TT-7070																			
EQT205	Cooler TT-7071																			
VOC Water Separators																				
EQT174	1 st Stage Vacuum System Separator PV-7000-04 (GRP 28)															2				
EQT175	2 nd Stage Vacuum System Separator PV-7001-04 (GRP 28)															2				
EQT176	3 rd Stage Vacuum System Separator PV-7002-04 (GRP 28)															2				
EQT177	DH Vacuum System Separator PV-7003-04 (GRP 28)															2				
EQT178	Sucrose Vacuum System Separator PV-7036-04 (GRP 28)															2				
EQT179	Amine Stage Vacuum System Separator PV-7037-04 (GRP 28)															2				
Wastewater Streams																				
ARE7	Polyol Plant Process Wastewater Stream																	2		2
ARE8	Maintenance Wastewater																	2		2

KTLEY TO MATRIX

- 1 - The regulations have applicable requirements which apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
 - 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank - The regulations clearly do not apply to this type of emission source.

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XII. Applicable Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS				40 CFR 61				40 CFR 63 NESHAP				40 CFR			
		A	Ka	Kb	Dc	A	M	FF	A	F	H	VV	Q	PPP	S2	64	68
UNF007	Polyols Plant	1				1	1	1	1						3	1	
EQT89	Vent Incinerator GI-7000 (EIQ TA)			2	2									1			
EQT90	Effluent Concentrator Vessel MS-7033 (EIQ TB)													2			
EQT92	PIPA Reactor MR-7065 (EIQ TF)													2			
EQT93	DELA Storage Tank MS-7059 (EIQ TG)													2			
EQT95	Blender Vent GB-7002 (EIQ TI)																
EQT98	Storage Tank MF-7003 (EIQ TM)		2														
EQT99	Diisocyanate Storage Tank MF-7063 (EIQ TN)																
EQT105	Product Storage Tank MF-7042A (EIQ TT)		2											2			
EQT106	Product Storage Tank MF-7042B (EIQ TU)		2											2			
EQT107	Test Tank MS-7032A (EIQ TW)													2			
EQT108	Test Tank MS-7032B (EIQ TX)													2			
EQT109	Test Tank MS-7032C (EIQ TY)													2			
EQT110	Product Storage Tank MF-7035A (EIQ TZ)		2											2			
EQT111	Product Storage Tank MF-7035B (EIQ T1)		2											2			
EQT112	Product Storage Tank MF-7035C (EIQ T2)		2											2			
EQT113	Product Storage Tank MF-7035D (EIQ T3)		2											2			
EQT114	Product Storage Tank MF-7035E (EIQ T4)		2											2			
EQT115	Product Storage MF-7061 (EIQ T5)		2											2			
EQT121	Product Storage Tank MF-7043A (EIQ UG)		2											2			
EQT122	Product Storage Tank MF-7043B (EIQ UH)		2											2			
EQT124	Silo MS-7038 (EIQ UL)		2											2			
EQT125	Process Effluent Tank MF-7021 (EIQ UM)		2											2			
EQT126	Rainwater Effluent Tank MF-7020 (EIQ UN)		2											2			

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		A	Ka	Kb	Db	Dc	A	M	FF	A	F	H	VV	Q	PPP	52	64	68
EQT127	Concentrated Effluent Tank MF-7033 (EIQ UO)																	
FUG11	Fugitive Emissions (EIQ UP)		2															
ACT1	Base Polyol Bulk Loading (EIQ UX)										1	1						
EQT131	Polyol Cooling Tower (EIQ UY)												2					
EQT129	Product Storage Tank MF-7079 (EIQ UZ)		2											2				
EQT130	Product Storage Tank MF-7078 (EIQ UI)		2											2				
EQT206	Product Storage Tank MS-7087 (EIQ U2)		2											2				
EQT207	Product Storage Tank MS-7088 (EIQ U3)		2											2				
EQT208	Product Storage Tank MS-7089 (EIQ U4)		2											2				
Tanks																		
EQT132	PO Storage Tanks MS-7006A/B																	1
EQT133	EO Storage Tank MS-7004																	1
Surge Control Vessels/Bottoms Receivers																		
EQT135	Accumulator GB-7000-4																	
EQT136	Vacuum System Seal Oil Tank GB-7001-01																	
EQT180	Vacuum System Seal Oil Reservoir GB-7000-01																	
EQT138	East Vacuum Hotwell MS-7039																	
EQT139	Center Vacuum Hotwell MS-7040																	
EQT140	West Vacuum Hotwell MS-7041																	
EQT181	Irganox Addition Pot GF-7078																	
EQT182	Adipic Acid Bag Dump MM-7028																	
EQT183	Tartaric Acid Bag Dump MM-7051																	
EQT184	Flex Deashing Filter GF-7031																	
EQT185	Sucrose Deashing Filter GF-7055																	
EQT141	Sucrose Weight Hopper GW-7050																	

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ID No.:	Description	40 CFR 60 NSPS				40 CFR 61				40 CFR 63 NESHAP				40 CFR				
		A	Ka	Kb	Db	Dc	A	M	FF	A	F	H	VV	Q	PPP	52	64	68
EQT142	Flexible Blender MR-7070																	
EQT143	Rigid Blender MR-7069																	
EQT144	Quench Water Collection Tank MS-7001																	
Reactor Systems																		
EQT145	1 st Stage Reactor MR-7015 (GRP 25)																	1
EQT146	2 nd Stage Reactor MR-7019 (GRP 25)																	1
EQT147	3 rd Stage Reactor MR-7023 (GRP 25)																	1
EQT148	Dehydration Tank MS-7030 (GRP 25)																	1
EQT149	Sucrose Reactor MR-7049 (GRP 25)																	1
EQT150	Amine Reactor MR-7050 (GRP 25)																	1
Heat Exchange Systems																		
EQT186	Chiller TT-7004																	2
EQT187	Chiller TT-7005																	2
EQT188	Chiller TT-7006																	2
EQT189	Chiller TT-7007																	2
EQT151	Condenser PV-7000-02																	2
EQT152	Condenser PV-7001-02																	2
EQT153	Condenser PV-7002-02																	2
EQT154	Condenser PV-7003-02																	2
EQT155	Condenser GR-7000																	2
EQT156	Condenser GR-7001-05																	2
EQT157	Vacuum System Condenser PV-7036-02																	2
EQT158	Vacuum System Condenser PV-7037-02																	2
EQT159	Oil Cooler PV-7000-06																	2

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ID No.:	Description	40 CFR 60 NSPS				40 CFR 61				40 CFR 63 NESHAP				40 CFR				
		A	Ka	Kb	Db	Dc	A	M	FF	A	F	H	VV	Q	PPP	52	64	68
EQT160	Oil Cooler GB-7000-03														2			
EQT161	Oil Cooler PV-7001-06														2			
EQT162	Oil Cooler PV-7002-06														2			
EQT190	Oil Cooler PV-7003-06														2			
EQT163	Oil Cooler PV-7036-06														2			
EQT164	Oil Cooler PV-7037-06														2			
EQT165	Oil Cooler GR-7001-04														2			
EQT191	Cooler TT-7015														2			
EQT192	Cooler TT-7017														2			
EQT166	Water Cooler TT-7018														2			
EQT193	Cooler TT-7019														2			
EQT194	Cooler TT-7021														2			
EQT171	Tempered Water Cooler TT-7022														2			
EQT195	Cooler TT-7023														2			
EQT196	Cooler TT-7024														2			
EQT167	Water Cooler TT-7025														2			
EQT197	Cooler TT-7033														2			
EQT168	Cooler TT-7034														2			
EQT198	Cooler TT-7036														2			
EQT199	Cooler TT-7037														2			
EQT172	Sucrose Tempered Water Cooler TT-7053														2			
EQT200	Cooler TT-7054														2			
EQT201	Cooler TT-7055														2			
EQT170	Cooler TT-7056														2			
EQT169	Cooler TT-7057														2			

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
POLYOLS PLANT
RUBICON LLC, AI NO. 1468
GEISMAR, ASCENSION PARISH, LOUISIANA

XII. Applicable Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS				40 CFR 61				40 CFR 63 NESHAP				40 CFR			
		A	Ka	Kb	Dc	A	M	FF	A	F	H	VV	Q	PPP	52	64	68
EQT173	Amine Product Cooler TT-7058													2			
EQT202	Cooler TT-7066													2			
EQT203	Cooler TT-7069													2			
EQT204	Cooler TT-7070													2			
EQT205	Cooler TT-7071													2			
VOC Water Separators																	
EQT174	1 st Stage Vacuum System Separator PV-7000-04 (GRP 28)																1
EQT175	2 nd Stage Vacuum System Separator PV-7001-04 (GRP 28)																1
EQT176	3 rd Stage Vacuum System Separator PV-7002-04 (GRP 28)																1
EQT177	DH Vacuum System Separator PV-7003-04 (GRP 28)																1
EQT178	Sucrose Vacuum System Separator PV-7036-04 (GRP 28)																1
Wastewater Streams																	
ARE7	Polyol Plant Process Wastewater Stream																2
ARE8	Maintenance Wastewater																2

KEY TO MATRIX

- 1 - The regulations have applicable requirements which apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source. Blank - The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

POLYOLS PLANT
RUBICON LLC, AI NO. 1468
GEISMAR, ASCENSION PARISH, LOUISIANA

XIII. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Status	Explanation
UNF007	Compliance Assurance Monitoring for Major Stationary Sources	Does not apply.	The facility is subject to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to Sections 111 and 112 of Clean Air Act.
EQT89 (EQ TA)	LAC 33:III.1313 – Emissions from Fuel Burning Equipment LAC 33:III.1503 – Emission Standards for Sulfur Dioxide NSPS Subpart Db – Industrial-Commercial-Institutional Steam Control Program NSPS Subpart Dc – Small Industrial-Commercial-Institutional Steam Generating Units	Does not apply. Exempt. Exempt. Exempt.	LAC 33:III.1313 LAC 33:III.1503 Unit emits less than 250 TPY of sulfur dioxide. Heat input rate < 100 MM BTU/hr. Constructed prior to June 9, 1989.
EQT90 (EQ TB)	LAC 33:III.2103. – Storage of VOC Compounds LAC 33:III.2153 Limiting VOC Emissions from Industrial Wastewater Subpart PPP Polyol MACT – Wastewater Provisions NSPS Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid	Exempt. Exempt. Exempt. Does not apply.	LAC 33:III.2103 LAC 33:III.2153 40 CFR 63.1433 40 CFR 60.110b True vapor pressure is less than 1.5 psia at storage conditions. Does not store material defined as a VOC under this regulation. Water stored does not meet the definition of regulated wastewater. Tank capacity is less than 19,813 gallons.
EQT92 (EQ TF)	LAC 33:III.2115 – Waste Gas Disposal LAC 33:III.2149 – Limiting VOC Emissions from Batch Processing	Exempt. Exempt	LAC 33:III.2149 LAC 33:III.2149.A.2b Exemption from LAC 33:III.2149 exempts unit (LAC 33:III.2149.A.1) Exempt from all provisions except recordkeeping because unit has a mass annual emission rate of less than 500 lbs/yr.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
POLYOLS PLANT
RUBICON LLC, AI NO. 1468
GEISMAR, ASCENSION PARISH, LOUISIANA

XIII. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Status	Citation
EQT92 (EIQ TF) (Continued)	NESHAP, Subpart PPP Polyol MACT – Storage Vessel Provisions	Exempt.	40 CFR 63.1432
EQT93 (EIQ TG)	LAC 33:III. 2103. – Storage of VOC Compounds	Exempt.	LAC 33:III.2103
	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid	Does not apply.	40 CFR 60.110b
	Subpart PPP Polyol MACT – Storage Vessel Provisions	Does not apply.	40 CFR 63.1432
EQT95 (EIQ TI)	LAC 33:III.2115 Waste Gas Disposal	Exempt.	LAC 33:III.2115.H.1.c
	NESHAP Subpart PPP Polyol MACT – Storage Vessel Provisions	Does not apply.	40 CFR 63.1432
EQT98 (EIQ TM)	LAC 33:III. 2103. – Storage of VOC Compounds	Exempt.	LAC 33:III.2103
	NSPS Subpart Kb – Standards of Performance for Storage Vessels for VOL	Exempt.	40 CFR 60.110b
	NESHAP Subpart PPP Polyol MACT – Storage Vessel Provisions	Exempt.	40 CFR 63.1432
EQT99 (EIQ TN)	LAC 33:III. 2103. – Storage of VOC Compounds	Exempt.	LAC 33:III.2103
	NSPS Subpart Kb – Standards of Performance for Storage Vessels for VOL	Does not apply.	40 CFR 60.110b

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**POLYOLS PLANT
RUBICON LLC, AI NO. 1468
GEISMAR, ASCENSION PARISH, LOUISIANA**

XIII. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Status	Explanation
EQT99 (EIQ TN) (Continued)	NESHAP Subpart PPP Polyol MACT – Storage Vessel Provisions	Does not apply.	Tank capacity < 10,568 gallons.
EQT105 (EIQ TT) EQT106 (EIQ TU)	LAC 33:III. 2103. – Storage of VOC Compounds NSPS Subpart Kb – Standards of Performance for Storage Vessels for VOL	Exempt.	True vapor pressure is less than 1.5 psia at storage conditions.
EQT107 (EIQ TW) EQT108 (EIQ TX) EQT109 (EIQ TY)	NESHAP Subpart PPP Polyol MACT – Storage Vessel Provisions LAC 33:III. 2103. – Storage of VOC Compounds NSPS Subpart Kb – Standards of Performance for Storage Vessels for VOL	Exempt.	Tank capacity is 19,813 – 39,890 gallons with a vapor pressure < 2.17 psia. Does not contain applicable compound.
EQT110 (EIQ TZ) EQT111 (EIQ T1) EQT112 (EIQ T2) EQT113 (EIQ T3) EQT114 (EIQ T4) EQT115 (EIQ T5)	NESHAP Subpart PPP Polyol MACT – Storage Vessel Provisions LAC 33:III. 2103. – Storage of VOC Compounds NSPS Subpart Kb – Standards of Performance for Storage Vessels for VOL	Exempt.	True vapor pressure is less than 1.5 psia at storage conditions. Tank capacity < 10,568 gallons. Does not contain applicable compound.
	NESHAP Subpart PPP Polyol MACT – Storage Vessel Provisions	Exempt.	True vapor pressure is less than 1.5 psia at storage conditions.
	NESHAP Subpart PPP Polyol MACT – Storage Vessel Provisions	Exempt.	Does not contain applicable compound.
	NESHAP Subpart PPP Polyol MACT – Storage Vessel Provisions	Exempt.	Does not contain applicable compound.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

POLYOLS PLANT
 RUBICON LLC, AI NO. 1468
 GEISMAR, ASCENSION PARISH, LOUISIANA

XIII. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Status	Explanation
EQT121 (EIQ UG) EQT122 (EIQ UH)	LAC 33:III. 2103. -- Storage of VOC Compounds	Exempt.	True vapor pressure is less than 1.5 psia at storage conditions
	NSPS Subpart Kb -- Standards of Performance for Storage Vessels for VOL	Exempt.	Tank capacity is 19,813 - 39,890 gallons with a vapor pressure < 2.17 psia.
	NESHAP Subpart PPP Polyol MACT - Storage Vessel Provisions	Exempt.	Does not contain applicable compound.
EQT124 (EIQ UL)	LAC 33:III. 2103. -- Storage of VOC Compounds	Exempt.	Does not contain a VOC.
	NSPS Subpart Kb -- Standards of Performance for Storage Vessels for VOL	Exempt.	Does not contain a VOC.
	NESHAP Subpart PPP Polyol MACT - Storage Vessel Provisions	Exempt.	Does not contain applicable compound.
EQT125 (EIQ UM) EQT126 (EIQ UN) EQT127 (EIQ UO)	LAC 33:III. 2103. -- Storage of VOC Compounds	Exempt.	True vapor pressure is less than 1.5 psia at storage conditions.
	NSPS Subpart Kb -- Standards of Performance for Storage Vessels for VOL	Exempt.	Vessel capacity is 19,813 - 39,890 gallons/each (UM & UO) with a vapor pressure < 2.17 psia. Vessel capacity is > 39,890 gallons with a vapor pressure < 0.51 psia (UN).
	NESHAP Subpart PPP Polyol MACT - Storage Vessel Provisions	Exempt.	Water stored does not meet the definition of regulated wastewater.
ACT1 (EIQ UX)	LAC 33:III. 2107 - Volatile Organic Compounds - Loading	Exempt.	True vapor pressure is less than 1.5 psia.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
POLYOLS PLANT
RUBICON LLC, AI NO. 1468
GEISMAR, ASCENSION PARISH, LOUISIANA

XIII. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Status	Explanation
EQT131 (EIQ UY)	NESHAP Subpart Q NESHAP for Industrial Process Cooling Towers	Exempt.	40 CFR 63.400 Not an affected unit, no chromium or chromium based water treatment chemicals used on or after September 8, 1994.
EQT129 (EIQ UZ) EQT130 (EIQ UT)	LAC 33:III. 2103. -- Storage of VOC Compounds NSPS Subpart Kb -- Standards of Performance for Storage Vessels for Volatile Organic Liquid	Exempt.	LAC 33:III.2103 True vapor pressure is less than 1.5 psia at storage conditions.
	NESHAP Subpart PPP Polyol MACT -- Storage Vessel Provisions	Exempt.	40 CFR 60.110b Vessel capacity is > 39,890 gallons with a vapor pressure < 0.51 psia.
EQT 206 (EIQ U2) EQT 207 (EIQ U3) EQT 208 (EIQ U4)	LAC 33:III. 2103. -- Storage of VOC Compounds NSPS Subpart Kb -- Standards of Performance for Storage Vessels for Volatile Organic Liquid	Exempt.	40 CFR 63.1432 Does not contain applicable compound.
	NESHAP Subpart PPP Polyol MACT -- Storage Vessel Provisions	Exempt.	40 CFR 60.110b True vapor pressure is less than 1.5 psia at storage conditions.
	NESHAP Subpart PPP Polyol MACT -- Storage Vessel Provisions	Exempt.	40 CFR 61.1432 Vessel capacity is ≥ 39,890 gallons with a vapor pressure < 0.51 psia.
	NESHAP Subpart Kb -- Standards of Performance for Storage Vessels for VOL	Exempt.	40 CFR 61.1432 Does not contain an applicable compound.
TANKS			
EQT 132 (PO Storage Tanks MS-7006A and B) EQT 133 (EO Storage Tank MS-7004)	NSPS Subpart Kb -- Standards of Performance for Storage Vessels for VOL	Does not apply.	40 CFR 60.110b Tanks potentially subject to both NSPS Subpart Kb and POLYOL MACT are only required to comply with POLYOL MACT (40 CFR 63.1422(i)).

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
POLYOLS PLANT
RUBICON LLC, AI NO. 1468
GEISMAR, ASCENSION PARISH, LOUISIANA

XIII. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Status	Citation
Explanation			
SURGE CONTROL VESSELS			
EQT135 (Accumulator GB-7000-04), EQT136 (Vacuum System Seal Oil Tank GB-7001-01), EQT 180 (Vacuum System Seal Oil Reservoir GB-7000-001), EQT 138 (East Vacuum Hotwell MS-7039), EQT139 (Center Vacuum Hotwell MS-7040), EQT140 (West Vacuum Hotwell MS-7041), EQT181 (Irganox Addition Pot GF-7078), EQT182 (Adipic Acid Bag Dump MM-7028), EQT183 (Tartaric Acid Bag Dump MM-7051)	LAC 33:III. 2103. - Storage of VOC Compounds NSPS Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic Liquid NESHAP Subpart PPP Polyol MACT - Storage Vessel Provisions	Does not apply. Does not apply. Does not apply.	LAC 33:III.2103 40 CFR 60.110b 40 CFR 63.1432
EQT141 (Sucrose Weigh Hopper GW-7050)	LAC 33:III. 2103. - Storage of VOC Compounds	Exempt.	LAC 33:III.2107.A.
EQT141 (Sucrose Weigh Hopper GW-7050) (Continued)	NSPS Subpart Kb - Standards of Performance for Storage Vessels for VOL NESHAP Subpart PPP Polyol MACT - Storage Vessel Provisions	Does not apply. Does not apply.	40 CFR 60.110b 40 CFR 63.1432
EQT184 (Flex Deashing Filter GF-7031) EQT185 (Sucrose	LAC 33:III. 2103. - Storage of VOC Compounds	Exempt.	LAC 33:III.2107.A.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
POLYOLS PLANT
RUBICON LLC, AI NO. 1468
GEISMAR, ASCENSION PARISH, LOUISIANA

XIII. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Status	Citation
	Dashing Filter GF-7055) NSPS Subpart Kb – Standards of Performance for Storage Vessels for VOL	Does not apply.	40 CFR 60.110b
	NESHAP Subpart PPP Polyol MACT – Storage Vessel Provisions	Does not apply.	40 CFR 63.1432
EQT142 (Flexible Blender MR-7070), EQT143 (Rigid Blender MR-7069), EQT144 (Quench Water Collection Tank MS-7001)	LAC 33:III. 2103. – Storage of VOC Compounds	Exempt.	LAC 33:III.2103
	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid	Does not apply.	40 CFR 60.110b
	NESHAP Subpart PPP Polyol MACT – Storage Vessel Provisions	Does not apply.	40 CFR 63.1432

REACTORS/DISTILLATION SYSTEMS			
ID No:	Requirement	Status	Citation
GROUP 25: EQT145 (1 st Stage Reactor MR-7015), EQT146 (2 nd Stage Reactor MR-7019), EQT147 (3 rd Stage Reactor MR-7023), EQT148 (Dehydration Tank MS-7030), EQT149 (Sucrose Reactor MR-7049), EQT150 (Amine Reactor MR-7050)	LAC 33:III.2115 – Waste Gas Disposal	Exempt	LAC 33:III.2149.A.1
	LAC 33:III.2149 – Limiting VOC Emissions from Batch Processing	Exempt.	LAC 33:III.2149.A.2.c

HEAT EXCHANGER SYSTEMS

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

POLYOLS PLANT
 RUBICON LLC, AI NO. 1468
 GEISMAR, ASCENSION PARISH, LOUISIANA

XIII. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Status	Citation
EQT186 (TT-7004); EQT187 (TT-7005); EQT188 (TT-7006); EQT189 (TT-7007); EQT151 (PV-7000-02); EQT152 (PV-7001-02); EQT153 (PV-7002-02); EQT154 (PV-7003-02); EQT155 (GR-7000); EQT156 (GR-7001-05); EQT157 (PV-7036-02); EQT158 (PV-7037-02); EQT159 (PV-7000-06); EQT160 (GB-7000-3); EQT161 (PV-7001-06); EQT162 (PV-7002-06); EQT190 (PV-7003-06); EQT163 (PV-7036-06); EQT164 (PV-7037-06); EQT165 (GR-7001-04)	40 CFR 63.1435 Polyol MACT - Subpart PPP - Heat Exchanger Provisions	Exempt.	40 CFR 63.1435
			Heat Exchanger System contains less than 5% by weight of an applicable compound.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
POLYOLS PLANT
RUBICON LLC, AI NO. 1468
GEISMAR, ASCENSION PARISH, LOUISIANA

XIII. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Status	Explanation
EQT166 (TT-7018), EQT167 (TT-7025), EQT168 (TT-7034), EQT169 (TT-7057), EQT170 (TT-7056), EQT171 (TT-7022), EQT172 (TT-7053), EQT173 (TT-7058), EQT191 (TT-7015), EQT192 (TT-7017), EQT193 (TT-7019), EQT194 (TT-7021), EQT195 (TT-7023), EQT196 (TT-7024), EQT197 (TT-7033), EQT168 (TT-7034), EQT198 (TT-7036), EQT199 (TT-7037), EQT200 (TT-7054), EQT201 (TT-7055), EQT202 (TT-7066), EQT209 (TT-7067), EQT203 (TT-7069), EQT204 (TT-7070), EQT205 (TT-7071)	40 CFR 63.1435 Polyol MACT - Subpart PPP - Heat Exchanger Provisions	Exempt.	Heat Exchanger System contains less than 5% by weight of an applicable compound.
VOC/WATER SEPARATORS			
GROUP 28: EQT174 (1 st Stage Vacuum System Separator PV-7000-04), EQT175 (2 nd Stage Vacuum System Separator PV-7001-04), EQT176 (3 rd Stage Vacuum System Separator PV-7002-04), EQT177 (DH Vacuum System Separator PV-7003-04), EQT178 (Sucrose Vacuum System Separator PV-7036-04), EQT179 (Amine Vacuum System Separator PV-7037-04)	LAC 33:III.2109 - Oil/Water Separation	Exempt	Exempt from control because VOC true vapor pressure is less than 0.5 psia (LAC 33:III.2109.B.3). Recordkeeping is required (LAC 33:III.2109.D.)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

POLYOLS PLANT
 RUBICON LLC, AI NO. 1468
 GEISMAR, ASCENSION PARISH, LOUISIANA

XIII. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Status	Citation
WASTEWATER STREAMS			
ARE7 (Polyol Plant Process Wastewater Stream)	LAC 33:III.2153 – limiting VOC Emissions from Industrial Wastewater	Exempt	LAC 33:III.2153.H.3.
	LAC 33:III.5109 – Comprehensive Toxic Air Pollutant Emission Control Program	Exempt	LAC 33:III.5109
ARE8 (Maintenance Wastewater)	Subpart PPP Polyol MACT – Wastewater Provisions	Exempt	40 CFR 63.1433
	LAC 33:III.2153 – limiting VOC Emissions from Industrial Wastewater	Exempt	LAC 33:III.2153.H.3.
	LAC 33:III.5109 – Comprehensive Toxic Air Pollutant Emission Control Program	Exempt	LAC 33:III.5109
	Subpart PPP Polyol MACT – Wastewater Provisions	Exempt	40 CFR 63.1433
<p>The above table provides explanation for both the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Section XI and XII of this permit</p>			

General Information

AI ID: 1468 Rubicon LLC - Geismar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

ID	Name	User Group	Start Date
	Rubicon LLC	Air Permitting	12-24-2003
0180-00006	Rubicon LLC - Geismar Plant	CDS Number	05-27-1993
LAD0008213191	Rubicon LLC - Geismar Plant	Hazardous Waste Notification	07-22-1980
PMT/PC	Rubicon LLC - Geismar Plant	Hazardous Waste Permitting	10-01-1997
0180-00006	Rubicon LLC - Geismar Plant	Historic Emission Inventory System (EIS) ID	02-25-2004
LAD0008213191	Rubicon LLC - Geismar Plant	Inactive & Abandoned Sites	07-01-1981
LA0000892	WPC File Number	LPDES Permit #	06-25-2003
LAR05N485	LPDES Permit #	LPDES Permit #	08-08-2004
WP1493	WPC State Permit Number	LWDPS Permit #	06-25-2003
LA-2232-L01	Radioactive Material License	Radiation License Number	11-23-1999
GD-005-1646	Site ID #	Solid Waste Facility No.	11-21-1999
38794	Rubicon LLC - Geismar Plant	TEMPO Merge	10-30-2000
48042	Rubicon LLC - Geismar Plant	TEMPO Merge	01-30-2001
70734RBCNN9156H	TRI #	Toxic Release Inventory	07-19-2004
03-011102	UST Facility ID (from UST legacy data)	UST FID #	10-11-2002
1482	Rubicon LLC - Geismar Plant	UST FID #	11-21-1999
1843	Rubicon LLC - Geismar Plant	UST FID #	11-21-1999

Physical Location: 9156 Hwy 75 Geismar, LA 70734
Main FAX: 2256732470
Main Phone: 2252425000

Mailing Address: PO Box 517 Geismar, LA 707340517

Location of Front Gate: 30.199672 latitude, -91.010128 longitude, Coordinate Method: Lat.Long. - DMS, Coordinate Datum: NAD83

Name	Mailing Address	Phone (Type)	Relationship
Michelle Eaglin	PO Box 517 Geismar, LA 707340517	2252425590 (WP)	Underground Storage Tank Contact for
Tom Harbourn	9156 Hwy 75 Geismar, LA 70734	2259783921 (CP)	Radiation Safety Officer for
Tom Harbourn	9156 Hwy 75 Geismar, LA 70734	2252425272 (WF)	Radiation Safety Officer for
Tom Harbourn	9156 Hwy 75 Geismar, LA 70734	2252425324 (WP)	Radiation Safety Officer for
Tom Harbourn	9156 Hwy 75 Geismar, LA 70734	Tom_J_Harbourn@H	Radiation Safety Officer for
Phil Kerr	PO Box 517 Geismar, LA 707340517	PHILLIP_A_KERR@	TEDI Contact for
Phil Kerr	PO Box 517 Geismar, LA 707340517	2252425027 (WP)	TEDI Contact for
Phil Kerr	PO Box 517 Geismar, LA 707340517	PHILLIP_A_KERR@	Emission Inventory Contact for
Phil Kerr	PO Box 517 Geismar, LA 707340517	2252425027 (WP)	Emission Inventory Contact for

General Information

AI ID: 1468 Rubicon LLC - Geismar Plant
 Activity Number: PIER20090017
 Permit Number: 2010-V1
 Air - Title V Regular Permit Renewal

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Phil Kerr	PO Box 517 Geismar, LA 707340517	2252425027 (WP)	Air Permit Contact For
	Phil Kerr	PO Box 517 Geismar, LA 707340517	PHILLIP_A_KERR@	Air Permit Contact For
	Thesia Krajewski	9156 Hwy 75 Geismar, LA 70734	2252425350 (WP)	Haz. Waste Billing Party for
	Anthony Nelson	PO Box 517 Geismar, LA 707340517		Water Permit Contact For
	C. Eric Phillips	PO Box 517 Geismar, LA 707340517	2256736141 (WP)	Responsible Official for
	Henry Pine			Responsible Official for
	Clyde Stevens			Responsible Official for

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Owns
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Water Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Air Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Haz. Waste Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Solid Waste Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Radiation License Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	UST Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Emission Inventory Billing Party
	Rubicon LLC - Geismar Plant	Attn Accountis Payable Geismar, LA 70734		Accident Prevention Billing Party for

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Milam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Polyols Plant						
ACT 0001	UX - Base Polyol Bulk Loading (UX)		463.5 MM lbs/yr	463.5 MM lbs/yr		8760 hr/yr
ARE 0007	- Polyol Plant Process Wastewater Stream					8760 hr/yr
ARE 0008	- Maintenance Wastewater					8760 hr/yr
EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)		66 MM BTU/hr	28.15 MM BTU/hr		8760 hr/yr
EQT 0080	TB - Effluent Concentrator Vessel MS-7033 (TB)	8567 gallons		96.89 MM bbl/yr		8760 hr/yr
EQT 0092	TF - PIPA Reactor MR-7065 (TF)	746 gallons		682407 gallons/yr		8760 hr/yr
EQT 0093	TG - DELA Storage Tank MS-7059 (TG)	7638 gallons		1370644 gallons/yr		8760 hr/yr
EQT 0095	TI - Flexible and Rigid Blender Vents GB-7002 (TI)			44828117 gallons/yr		8760 hr/yr
EQT 0098	TM - Flexible Blend Storage Tank MF-7003 (TM)	37601 gallons		9569028 gallons/yr		8760 hr/yr
EQT 0099	TN - Diisocyanate Storage Tank MF-7063 (TN)	6340 gallons		192000 gallons/yr		8760 hr/yr
EQT 0105	TO - Amine Product Storage Tank A-MF7042A (TO)	25569 gallons		5727574 gallons/yr		8760 hr/yr
EQT 0106	TU - Amine Product Storage Tank B-MF7042B (TU)	25569 gallons		5727574 gallons/yr		8760 hr/yr
EQT 0107	TW - Flexible Test Tank A-MS7032A (TW)	13537 gallons		8598380 gallons/yr		8760 hr/yr
EQT 0108	TX - Flexible Test Tank A-MS7032B (TX)	13537 gallons		8598380 gallons/yr		8760 hr/yr
EQT 0109	TY - Flexible Test Tank A-MS7032C (TY)	13537 gallons		8598380 gallons/yr		8760 hr/yr
EQT 0110	TZ - Flexible Product Storage Tank A-MF7035A (TZ)	37601 gallons		5727574 gallons/yr		8760 hr/yr
EQT 0111	T1 - Flexible Product Storage Tank B-MF7035B (T1)	37601 gallons		5727574 gallons/yr		8760 hr/yr
EQT 0112	T2 - Flexible Product Storage Tank C-MF7035C (T2)	37601 gallons		5727574 gallons/yr		8760 hr/yr
EQT 0113	T3 - Flexible Product Storage Tank D-MF7035D (T3)	37601 gallons		5896032 gallons/yr		8760 hr/yr
EQT 0114	T4 - Flexible Product Storage Tank E-MF7035E (T4)	37601 gallons		5896032 gallons/yr		8760 hr/yr
EQT 0115	T5 - PIPA Flexible Product Storage MF-7061 (T5)	25569 gallons		1755044 gallons/yr		8760 hr/yr
EQT 0121	UG - Sucrose Product Storage Tank A-MF7043A (UG)	25569 gallons		5727574 gallons/yr		8760 hr/yr
EQT 0122	UH - Sucrose Product Storage Tank B-MF7043B (UH)	25569 gallons		5727574 gallons/yr		8760 hr/yr
EQT 0124	UL - Sucrose Silo MS-7038 (UL)		21.5 MM lbs/yr	21500000 lb/yr		8760 hr/yr
EQT 0125	UM - Process Effluent Tank MF-7021 (UM)	26483 gallons		11675209 gallons/yr		8760 hr/yr
EQT 0126	UN - Rainwater Effluent Tank MF-7020 (UN)	50635 gallons		1074101 gallons/yr		8760 hr/yr
EQT 0127	UO - Concentrated Effluent Tank MF-7033 (UO)	26438 gallons		500564 gallons/yr		8760 hr/yr
EQT 0129	UZ - Flexible Product Storage Tank MF-7079 (UZ)	70503 gallons		11792063 gallons/yr		8760 hr/yr
EQT 0130	U1 - Amine Product Storage Tank MF-7078 (U1)	70503 gallons		6275354 gallons/yr		8760 hr/yr
EQT 0131	UY - Polyol Cooling Tower (UY)		9800 gallons/min	9800 gallons/min		8760 hr/yr
EQT 0132	- PO Storage Tanks MS-7006A/B					8760 hr/yr
EQT 0133	- EO Storage Tank MS-7004					8760 hr/yr
EQT 0135	- Accumulator GB-7000-4					8760 hr/yr
EQT 0136	- Vacuum System Seal Oil Tank GB-7000-01					8760 hr/yr
EQT 0138	- East Vacuum Hotwell MS-7039					8760 hr/yr
EQT 0139	- Center Vacuum Hotwell MS-7040					8760 hr/yr
EQT 0140	- West Vacuum Hotwell MS-7041					8760 hr/yr
EQT 0141	- Sucrose Weigh Hopper GW-7050					8760 hr/yr
EQT 0142	- Flexible Blender MR-7070					8760 hr/yr

INVENTORIES
AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Polyols Plant						
EQT 0143	- Rigid Blender MR-7069					8760 hr/yr
EQT 0144	- Quench Water Collection Tank MS-7001					8760 hr/yr
EQT 0145	- 1st Stage Reactor MR-7015					8760 hr/yr
EQT 0146	- 2nd Stage Reactor MR-7019					8760 hr/yr
EQT 0147	- 3rd Stage Reactor MR-7023					8760 hr/yr
EQT 0148	- Dehydration Tank MS-7030					8760 hr/yr
EQT 0149	- Sucrose Reactor MR-7049					8760 hr/yr
EQT 0150	- Amine Reactor MR-7050					8760 hr/yr
EQT 0151	- Condenser PV-7000-02					8760 hr/yr
EQT 0152	- Condenser PV-7001-02					8760 hr/yr
EQT 0153	- Condenser PV-7002-02					8760 hr/yr
EQT 0154	- Condenser PV-7003-02					8760 hr/yr
EQT 0157	- Vacuum System Condenser PV-7036-02					8760 hr/yr
EQT 0158	- Vacuum System Condenser PV-7037-02					8760 hr/yr
EQT 0159	- Oil Cooler PV-7000-06					8760 hr/yr
EQT 0160	- Oil Cooler GB-7000-03					8760 hr/yr
EQT 0161	- Oil Cooler PV-7001-06					8760 hr/yr
EQT 0162	- Oil Cooler PV-7002-06					8760 hr/yr
EQT 0163	- Oil Cooler PV-7036-06					8760 hr/yr
EQT 0164	- Oil Cooler PV-7037-06					8760 hr/yr
EQT 0166	- Water Cooler TT-7018					8760 hr/yr
EQT 0167	- Water Cooler TT-7025					8760 hr/yr
EQT 0168	- Cooler TT-7034					8760 hr/yr
EQT 0169	- Cooler TT-7057					8760 hr/yr
EQT 0170	- Cooler TT-7056					8760 hr/yr
EQT 0171	- Tempered Water TT-7022					8760 hr/yr
EQT 0172	- Sucrose Tempered Water Cooler TT-7053					8760 hr/yr
EQT 0173	- Amine Product Cooler TT-7058					8760 hr/yr
EQT 0174	- 1st Stage Vacuum System Separator PV-7000-04					8760 hr/yr
EQT 0175	- 2nd Stage Vacuum System Separator PV-7001-04					8760 hr/yr
EQT 0176	- 3rd Stage Vacuum System Separator PV-7002-04					8760 hr/yr
EQT 0177	- DH Vacuum System Separator PV-7003-04					8760 hr/yr
EQT 0178	- Sucrose Vacuum System Separator PV-7036-04					8760 hr/yr
EQT 0179	- Amine Stage Vacuum System Separator PV-7037-04					8760 hr/yr
EQT 0180	- Vacuum System Seal Oil Reservoir GB-7000-01					8760 hr/yr
EQT 0181	- Irganox Addition Pot GF-7078					8760 hr/yr
EQT 0182	- Adipic Acid Bag Dump MM-7028					8760 hr/yr
EQT 0183	- Tartaric Acid Bag Dump MM-7051					8760 hr/yr
EQT 0184	- Flex Deashing Filter GF-7031					8760 hr/yr

INVENTORIES

AI ID: 1468 - Rubicon LLC - Gelsimar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Polyols Plant						
EQT 0185	- Sucrose Deashing Filter GF-7055					8760 hr/yr
EQT 0186	- Chiller TT-7004					8760 hr/yr
EQT 0187	- Chiller TT-7005					8760 hr/yr
EQT 0188	- Chiller TT-7006					8760 hr/yr
EQT 0189	- Chiller TT-7007					8760 hr/yr
EQT 0190	- Oil Cooler PV-7003-06					8760 hr/yr
EQT 0191	- Cooler TT-7015					8760 hr/yr
EQT 0192	- Cooler TT-7017					8760 hr/yr
EQT 0193	- Cooler TT-7019					8760 hr/yr
EQT 0194	- Cooler TT-7021					8760 hr/yr
EQT 0195	- Cooler TT-7023					8760 hr/yr
EQT 0196	- Cooler TT-7024					8760 hr/yr
EQT 0197	- Cooler TT-7033					8760 hr/yr
EQT 0198	- Cooler TT-7036					8760 hr/yr
EQT 0199	- Cooler TT-7037					8760 hr/yr
EQT 0200	- Cooler TT-7054					8760 hr/yr
EQT 0201	- Cooler TT-7055					8760 hr/yr
EQT 0202	- Cooler TT-7066					8760 hr/yr
EQT 0203	- Cooler TT-7069					8760 hr/yr
EQT 0204	- Cooler TT-7070					8760 hr/yr
EQT 0205	- Cooler TT-7071					8760 hr/yr
EQT 0206	U2 - Product Storage Tank MS-7087 (U2)	5521 gallons		5896032 gallons/yr		8760 hr/yr
EQT 0207	U3 - Product Storage Tank MS-7088 (U3)	5521 gallons		5896032 gallons/yr		8760 hr/yr
EQT 0208	U4 - Product Storage Tank MS-7089 (U4)	5521 gallons		5896032 gallons/yr		8760 hr/yr
EQT 0209	- Cooler TT-7067					8760 hr/yr
FUG 0011	UP - Fugitive Emissions (UP)					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Polyols Plant							
EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)	61	37000	8		110	1562
EQT 0090	TB - Effluent Concentrator Vessel MS-7033 (TB)	96	2000	.67		30	212
EQT 0092	TF - PIPA Reactor MR-7065 (TF)	9.2	12	.17		85	200
EQT 0093	TG - DELA Storage Tank MS-7059 (TG)	.07	.35	.33		17	105
EQT 0095	TI - Flexible and Rigid Blender Vents GB-7002 (TI)	1	11.4	.5		85	66
EQT 0098	TM - Flexible Blend Storage Tank MF-7003 (TM)	.21	2.4	.5		25	80

INVENTORIES
AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Polyols Plant							
EQT 0099	TN - Diisocyanate Storage Tank MF-7063 (TN)	.01	.05	.08		20	100
EQT 0105	TT - Amine Product Storage Tank A-MF7042A (TT)	.12	1.5	.5		22	120
EQT 0106	TU - Amine Product Storage Tank B-MF7042B (TU)	.12	1.5	.5		22	120
EQT 0107	TW - Flexible Test Tank A-MS7032A (TW)	.74	2.2	.25		23	140
EQT 0108	TX - Flexible Test Tank A-MS7032B (TX)	.74	2.2	.25		23	140
EQT 0109	TY - Flexible Test Tank A-MS7032C (TY)	.74	2.2	.25		23	140
EQT 0110	TZ - Flexible Product Storage Tank A-MF7035A (TZ)	.12	1.5	.5		30	110
EQT 0111	T1 - Flexible Product Storage Tank B-MF7035B (T1)	.12	1.5	.5		30	110
EQT 0112	T2 - Flexible Product Storage Tank C-MF7035C (T2)	.12	1.5	.5		30	110
EQT 0113	T3 - Flexible Product Storage Tank D-MF7035D (T3)	.13	1.5	.5		30	110
EQT 0114	T4 - Flexible Product Storage Tank E-MF7035E (T4)	.13	1.5	.5		30	110
EQT 0115	T5 - PIPA Flexible Product Storage MF-7061 (T5)	.04	.45	.5		30	120
EQT 0121	UG - Sucrose Product Storage Tank A-MF7043A (UG)	.12	1.5	.5		22	120
EQT 0122	UH - Sucrose Product Storage Tank B-MF7043B (UH)	.12	1.5	.5		22	120
EQT 0124	UL - Sucrose Silo MS-7038 (UL)	.12	5.5	1		90	70
EQT 0125	UM - Process Effluent Tank MF-7021 (UM)	.6	3	.33		25	150
EQT 0126	UN - Rainwater Effluent Tank MF-7020 (UN)	.06	.3	.33		30	100
EQT 0127	UO - Concentrated Effluent Tank MF-7033 (UO)	.04	.13	.25		25	160
EQT 0129	UZ - Flexible Product Storage Tank MF-7079 (UZ)	4.1	3	.13		31	140
EQT 0130	U1 - Amine Product Storage Tank MF-7078 (U1)	.14	1.6	.13		31	140
EQT 0131	UY - Polyol Cooling Tower (UY)						
EQT 0206	U2 - Product Storage Tank MS-7087 (U2)	1.14	1.5	.17		46	120
EQT 0207	U3 - Product Storage Tank MS-7088 (U3)	1.5	1.14	.17		46	120
EQT 0208	U4 - Product Storage Tank MS-7089 (U4)	1.14	1.5	.17		46	120
FUG 0011	UP - Fugitive Emissions (UP)						

Relationships:

ID	Description	Relationship	ID	Description
EQT 0132	- PO Storage Tanks MS-7006A/B	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0133	- EO Storage Tank MS-7004	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0135	- Accumulator GB-7000-4	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0136	- Vacuum System Seal Oil Tank GB-7000-01	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0138	- East Vacuum Hotwell MS-7039	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)

INVENTORIES

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
 Activity Number: PER20090017
 Permit Number: 2010-V1
 Air - Title V Regular Permit Renewal

Relationships:

ID	Description	Relationship	ID	Description
EQT 0139	- Center Vacuum Hotwell MS-7040	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0140	- West Vacuum Hotwell MS-7041	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0141	- Sucrose Weigh Hopper GW-7050	Vents to	EQT 0124	JL - Sucrose Silo MS-7038 (UL)
EQT 0142	- Flexible Blender MR-7070	Vents to	EQT 0095	TI - Flexible and Rigid Blender Vents GB-7002 (TI)
EQT 0143	- Rigid Blender MR-7069	Vents to	EQT 0095	TI - Flexible and Rigid Blender Vents GB-7002 (TI)
EQT 0144	- Quench Water Collection Tank MS-7001	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0145	- 1st Stage Reactor MR-7015	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0146	- 2nd Stage Reactor MR-7019	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0147	- 3rd Stage Reactor MR-7023	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0148	- Dehydration Tank MS-7030	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0149	- Sucrose Reactor MR-7049	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0150	- Amine Reactor MR-7050	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0151	- Condenser PV-7000-02	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0152	- Condenser PV-7001-02	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0153	- Condenser PV-7002-02	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0154	- Condenser PV-7003-02	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0157	- Vacuum System Condenser PV-7036-02	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0158	- Vacuum System Condenser PV-7037-02	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0159	- Oil Cooler PV-7000-06	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0160	- Oil Cooler GB-7000-03	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0161	- Oil Cooler PV-7001-06	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0162	- Oil Cooler PV-7002-06	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0163	- Oil Cooler PV-7036-06	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0164	- Oil Cooler PV-7037-06	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0179	- Amine Stage Vacuum System Separator PV-7037-04	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0184	- Flex Deashing Filter GF-7031	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)
EQT 0185	- Sucrose Deashing Filter GF-7055	Controlled by	EQT 0089	TA - Polyols Thermal Oxidizer GI-7000 (TA)

Subject Item Groups:

ID	Group Type	Group Description
CRG 0032	Common Requirements Group	- Reactors
CRG 0033	Common Requirements Group	- Vacuum System Separators
UNF 0007	Unit or Facility Wide	- Polyols Plant

Group Membership:

ID	Description	Member of Groups

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090017
 Permit Number: 2010-V1
 Air - Title V Regular Permit Renewal

Group Memberships:

ID	Description	Member of Groups
EQT 0145	- 1st Stage Reactor MR-7015	CRG00000000032
EQT 0146	- 2nd Stage Reactor MR-7019	CRG00000000032
EQT 0147	- 3rd Stage Reactor MR-7023	CRG00000000032
EQT 0148	- Dehydration Tank MS-7030	CRG00000000032
EQT 0149	- Sucrose Reactor MR-7049	CRG00000000032
EQT 0150	- Amine Reactor MR-7050	CRG00000000032
EQT 0174	- 1st Stage Vacuum System Separator PV-7000-04	CRG00000000033
EQT 0175	- 2nd Stage Vacuum System Separator PV-7001-04	CRG00000000033
EQT 0176	- 3rd Stage Vacuum System Separator PV-7002-04	CRG00000000033
EQT 0177	- DH Vacuum System Separator PV-7003-04	CRG00000000033
EQT 0178	- Sucrose Vacuum System Separator PV-7036-04	CRG00000000033
EQT 0179	- Amine Stage Vacuum System Separator PV-7037-04	CRG00000000033

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0610	0610 Styrene Monomer (Rated Capacity)	1	MM lbs/yr

SIC Codes:

2865	Cyclic organic crudes, intermediates, dyes and pigments	UNF 007
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EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090017
 Permit Number: 2010-V1
 Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
Polyols Plant															
ACT 0001															
UJ															
EQT 0089	2.32	5.44	9.92	7.04	16.50	30.92	0.21	0.49	2.15	0.02	0.04	0.07	0.16	0.32	0.70
TA															
EQT 0090							0.08	0.10	0.33				1.32	1.65	5.79
TB													<0.01		<0.01
EQT 0092													<0.01		<0.01
TF													<0.01		<0.01
EQT 0093													<0.01		<0.01
TG													0.02	0.05	0.09
EQT 0095													<0.01		<0.01
TI													<0.01		<0.01
EQT 0098													<0.01		<0.01
TM													<0.01		<0.01
EQT 0099													<0.01		<0.01
TN													<0.01		<0.01
EQT 0105													<0.01		<0.01
TT													<0.01		<0.01
EQT 0106													<0.01		<0.01
TU													<0.01		<0.01
EQT 0107													<0.01		<0.01
TW													<0.01		<0.01
EQT 0108													<0.01		<0.01
TX													<0.01		<0.01
EQT 0109													<0.01		<0.01
TY													<0.01		<0.01
EQT 0110													<0.01		<0.01
TZ													<0.01		<0.01
EQT 0111													<0.01		<0.01
TI													<0.01		<0.01
EQT 0112													<0.01		<0.01
TZ													<0.01		<0.01
EQT 0113													<0.01		<0.01
T0													<0.01		<0.01
EQT 0114													<0.01		<0.01
T4													<0.01		<0.01
EQT 0115													<0.01		<0.01
T5													<0.01		<0.01
EQT 0121													<0.01		<0.01
UG													<0.01		<0.01
EQT 0122													<0.01		<0.01
UH													<0.01		<0.01
EQT 0124							0.05		0.22						
UL													<0.01		<0.01
EQT 0125													<0.01		<0.01
UM													<0.01		<0.01

TPOR0145

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090017
 Permit Number: 2010-V1
 Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
Polyols Plant															
EQT 0126															
UN															
EQT 0127															
UO															
EQT 0129															
UZ															
EQT 0130															
U1															
EQT 0131															
UY															
EQT 0206															
U2															
EQT 0207															
U3															
EQT 0208															
U4															
FUG 0011															
UP															

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AJ ID: 1468 - Rubicon LLC - Gelsmar Plant

Activity Number: PER20090017

Permit Number: 2010-V1

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0089 TA	Ethylene oxide	0.001	0.001	0.004
	Propylene oxide	0.04	0.05	0.17
EQT 0093 TG	Diethanolamine	<0.001		0.001
EQT 0099 TN	Methylene diphenyl diisocyanate	<0.001		<0.001
EQT 0131 UY	Chlorine	<0.001		<0.001
FUG 0011 UP	2,4-Toluene diamine	0.01		0.02
	Diethanolamine	0.03		0.12
	Ethylene glycol	0.03		0.11
	Ethylene oxide	0.06		0.24
	Methylene diphenyl diisocyanate	0.01		0.05
	Propylene oxide	0.14		0.63
UNF 0007	2,4-Toluene diamine			0.02
	Chlorine			<0.001
	Diethanolamine			0.12
	Ethylene glycol			0.11
	Ethylene oxide			0.24
	Methylene diphenyl diisocyanate			0.05
	Propylene oxide			0.80

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
 Activity Number: PER20090017
 Permit Number: 2010-V1
 Air - Title V Regular Permit Renewal

CRG 0032 - Reactors

Group Members: EQT 0145EQT 0146EQT 0147EQT 0148EQT 0149EQT 0150

- 1 [40 CFR 63.1425] 40 CFR 63.1425 - Subpart PPP
 Polyol MACT - Process Vent Control Requirements
 Maintain an outlet concentration at the control device of <= 20 ppmv.
- 2 [LAC 33:III.5109.A] MACT for Class I and Class II state air toxic per 5109.A. Vents are sent through a closed vent system to a control device Polyols Thermal Oxidizer GI-7000 (EQT 89) with a 99.99% destruction efficiency, determined as MACT.

CRG 0033 - Vacuum System Separators

Group Members: EQT 0174EQT 0175EQT 0176EQT 0177EQT 0178EQT 0179

- 3 [40 CFR 63.1433(PPP)] Polyol MACT Subpart PPP- Wastewater Provisions
 Vents are sent to a control deive (Emission Point TA). [40 CFR 63.1433(PPP)]
- 4 [LAC 33:III.2109.D] Exempt from control because VOC true vapor pressure is less than 0.5 psia (LAC 33:III.2109.B.3). Recordkeeping is required as per LAC 33:III.2109.D. Pressure recordkeeping by electronic or hard copy as needed.
- 5 [LAC 33:III.5109.A] MACT for Class I and Class II state air toxic per 5109.A. Vents are sent through a closed vent system to a control device Polyols Thermal Oxidizer GI-7000 (EQT 89) with a 99.99% destruction efficiency, determined as MACT.

EQT 0089 TA - Polyols Thermal Oxidizer GI-7000 (TA)

- 6 [40 CFR 63.1425] 40 CFR 63.1425 - Subpart PPP
 Polyol MACT - Process Vent Control Requirements
 Maintain an outlet concentration at the control device of <= 20 ppmv.
- 7 [40 CFR 63.1429] The monitor shall be installed in the firebox or in the ductwork immediately downstream of the firebox before any substantial heat exchange is encountered. Temperature monitored by temperature monitoring device continuously.
 Which Months: All Year Statistical Basis: None specified
- 8 [40 CFR 63.1430] Maintain continuous records of the firebox temperature or immediately downstream of the firebox before daily exchange. Record the average daily firebox temperature per 40 CFR 63.1429 excluding periods of monitoring system breakdowns, repairs, calibrations and level adjustments.
 Record time and duration of monitoring system breakdown, repairs, calibration and level adjustments. Temperature recordkeeping by recorder continuously.
- 9 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
 Which Months: All Year Statistical Basis: None specified
 Emission of smoke shall be controlled so that the shade is not darker than 20% opacity for not more than one 6 minute period in any consecutive 60 minute period.
- 11 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

SPECIFIC REQUIREMENTS

AJ ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

EQT 0090 TB - Effluent Concentrator Vessel MS-7033 (TB)

12 [LAC 33:III.2109] Maintain records of measurement of true vapor pressure to verify exemption due to true vapor pressure of less than 0.5 psia. Pressure recordkeeping by electronic or hard copy as needed.

EQT 0092 TF - PIPA Reactor MR-7065 (TF)

13 [LAC 33:II.2149] Records for 5 years of annual emissions and documentation of values. VOC. Total recordkeeping by electronic or hard copy annually.

EQT 0124 UL - Sucrose Silo MS-7038 (UL)

14 [LAC 33:II.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7.
 15 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
 Which Months: All Year Statistical Basis: Six-minute average

EQT 0132 - PO Storage Tanks MS-7006A/B

16 [40 CFR 63.1425] Vents are sent through a closed vent system to a control device Polyols Thermal Oxidizer GI-7000 (EQT 89). Maintain an outlet concentration at the control device of <= 20 ppmv.
 17 [40 CFR 63.1432] Maintain control device records documenting a daily average temperature > 1562 degrees Fahrenheit.
 18 [40 CFR 63.PPP(63.1432)] Record dimensions of tank and analysis showing vessel capacity. Temperature recordkeeping by recorder daily.
 Comply with Polyl MACT 40 CFR 63.1432, Subpart PPP. Vents are sent through a closed vent system to a control device Polyols Thermal Oxidizer GI-7000 (EQT 89). Tanks are Group 1 storage vessels. [40 CFR 63.PPP(63.1432)]
 19 [LAC 33:II.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place. Vents are sent through a closed vent system to a control device (EQT 89).
 20 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
 21 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
 22 [LAC 33:III.5109.A] MACT is the Polyols MACT Subpart PPP, which requires 98 percent control for 20 ppmv at the outlet, determined as MACT.

EQT 0133 - EO Storage Tank MS-7004

23 [40 CFR 63.1432] Polyol MACT Subpart PPP - Storage Vessel Provisions
 Vessel capacity is 15,468 gallons, recordkeeping only, record dimensions of tank and analysis showing vessel capacity, Group 2 storage vessel.
 24 [40 CFR 63.1432] Subpart PPP Group 2 storage vessel. Equipment/operational data recordkeeping by electronic or hard copy as needed.
 25 [LAC 33:III.2103] Comply with LAC 33:III.2103. Vents are sent through a closed vent system to a control device Polyols Thermal Oxidizer GI-7000 (EQT 89).

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090017
 Permit Number: 2010-V1
 Air - Title V Regular Permit Renewal

EQT 0133 - EO Storage Tank MS-7004

26 [LAC 33:III.5109.A] MACT is the Polyols MACT Subpart PPP, which requires 98 percent control for 20 ppmv at the outlet, determined as MACT.

FUG 0011 UP - Fugitive Emissions (UP)

- 27 [40 CFR 63.1434(a)] Shall comply with 40 CFR 63 Subpart H, except noted at 63.1434(b) through (g). [40 CFR 63.1434(a)]
- 28 [40 CFR 63.163(b)(1)] Pumps in light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, except as provided in 40 CFR 63.162(b) and 63.163(e) through (j). If a reading of 10,000 ppm (phase I); 5,000 ppm (phase II); or 5,000 ppm (phase III, pumps handling polymerizing monomers), 2,000 ppm (phase III, pumps in food/medical service), or 1,000 ppm (phase III, all other pumps) or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(1)]
 Which Months: All Year Statistical Basis: None specified
- 29 [40 CFR 63.163(b)(3)] Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate the repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(3)]
 Which Months: All Year Statistical Basis: None specified
- 30 [40 CFR 63.163(c)] Pumps in light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.163(c)(3) and 40 CFR 63.171. Subpart H. [40 CFR 63.163(c)]
- 31 [40 CFR 63.163(d)(2)] Pumps in light liquid service: Implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.176, if, in Phase III, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak. Subpart H. [40 CFR 63.163(d)(2)]
- 32 [40 CFR 63.163(d)(3)] The number of pumps at a process unit shall be the sum of all the pumps in organic HAP service, except that pumps found leaking in a continuous process unit within 1 month after start-up of the pump shall not count in the percent leaking pumps calculation for that one monitoring period only. [40 CFR 63.163(d)(3)]
- 33 [40 CFR 63.163(d)(4)] Pumps in light liquid service: Determine percent leaking pumps using the equation in 40 CFR 63.163(d)(4). Subpart H. [40 CFR 63.163(d)(4)]
- 34 [40 CFR 63.163(e)(4)] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquid dripping from the pump seal at the time of the weekly inspection, monitor the pump as specified in 40 CFR 63.180(b) to determine if there is a leak of organic HAP in the barrier fluid. If an instrument reading of 1,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.163(e)(6). Subpart H. [40 CFR 63.163(e)(4)]
 Which Months: All Year Statistical Basis: None specified
- 35 [40 CFR 63.163(e)] Pumps in light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the pump is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.163(e)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(e)(6). Subpart H. [40 CFR 63.163(e)]
 Which Months: All Year Statistical Basis: None specified
- 36 [40 CFR 63.163(h)] Pumps in light liquid service (unmanned plant site): Presence of a leak monitored by visual inspection/determination at the regulation's specified frequency. Monitor each pump as often as practicable and at least monthly. Subpart V. [40 CFR 63.163(h)]
 Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

FUG 0011 UP - Fugitive Emissions (UP)

- 37 [40 CFR 63.163(j)(1)] Pumps in light liquid service (unsafe-to-monitor): Determine that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.163(b) through (d). Subpart H. [40 CFR 63.163(j)(1)]
- 38 [40 CFR 63.163(j)(2)] Pumps in light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable. Subpart H. [40 CFR 63.163(j)(2)]
 Which Months: All Year Statistical Basis: None specified
- 39 [40 CFR 63.164(a)] Compressors: Equip with a seal system that includes a barrier fluid system and that prevents leakage of process fluid to the atmosphere, except as provided in 40 CFR 63.162(b) and 40 CFR 63.164(h) and (i). Subpart H. [40 CFR 63.164(a)]
- 40 [40 CFR 63.164(b)] Compressors: Operate the seal system with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or equip with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid directly into a process stream. Subpart H. [40 CFR 63.164(b)]
- 41 [40 CFR 63.164(c)] Compressors: Ensure that the barrier fluid is not in light liquid service. Subpart H. [40 CFR 63.164(c)]
- 42 [40 CFR 63.164(d)] Compressors: Equip each barrier fluid system as described in 40 CFR 63.164(a) through (c) with a sensor that will detect failure of the seal system, barrier fluid system, or both. Subpart H. [40 CFR 63.164(d)]
- 43 [40 CFR 63.164(e)(1)] Each sensor shall be observed daily or shall be equipped with an alarm unless the compressor is located within the boundary of an unmanned plant site. [40 CFR 63.164(e)(1)]
- 44 [40 CFR 63.164(e)(2)] Compressors (sensor): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. Subpart H. [40 CFR 63.164(e)(2)]
- 45 [40 CFR 63.164(g)] Compressors: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.164(g)]
- 46 [40 CFR 63.164(i)(2)] Compressors (no detectable emissions): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, and at other times requested by DEQ. Subpart H. [40 CFR 63.164(i)(2)]
 Which Months: All Year Statistical Basis: None specified
- 47 [40 CFR 63.164] Compressors (sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an alarm, unless the compressor is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined under 40 CFR 63.164(e)(2), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.164(g). Subpart H.
 Which Months: All Year Statistical Basis: None specified
- 48 [40 CFR 63.165(a)] Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with an instrument reading of less than 500 parts per million above background except as provided in paragraph (b) of this section, as measured by the method specified in 40 CFR 63.180(c) of this subpart. [40 CFR 63.165(a)]
- 49 [40 CFR 63.165(a)] Pressure relief device in gas/vapor service: Organic HAP < 500 ppm above background except during pressure releases, as determined by the method specified in 63.180(c). Subpart H. [40 CFR 63.165(a)]
 Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant

Activity Number: PER20090017

Permit Number: 2010-V1

Air - Title V Regular Permit Renewal

FUG 0011 UP - Fugitive Emissions (UP)

- 50 [40 CFR 63.165(b)(1)] Pressure relief devices in gas/vapor service: After each pressure release, return to a condition indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.165(b)(1)]
- 51 [40 CFR 63.165(b)(2)] Pressure relief devices in gas/vapor service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) after the pressure release and being returned to organic HAP service, to confirm the condition indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 63.180(c). Subpart H. [40 CFR 63.165(b)(2)]
Which Months: All Year Statistical Basis: None specified
- 52 [40 CFR 63.165(d)(2)] Pressure relief devices in gas/vapor service (rupture disk): After each pressure release, install a new rupture disk upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Subpart V. [40 CFR 63.165(d)(2)]
- 53 [40 CFR 63.166] Sampling connection systems: Equip with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 63.162(b). Operate the system as specified in 40 CFR 63.166(b). Subpart H.
- 54 [40 CFR 63.167] Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and 40 CFR 63.167(d) and (e). Ensure that the cap, blind flange, plug or second valve seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair. Operate each open-ended valve or line equipped with a second valve in a manner such that the valve on the process fluid end is closed before the second valve is closed. Subpart H.
- 55 [40 CFR 63.168(c)] Valves in gas/vapor service or light liquid service (Phase I): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
Which Months: All Year Statistical Basis: None specified
- 56 [40 CFR 63.168(c)] Valves in gas/vapor service or light liquid service (Phase II): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
Which Months: All Year Statistical Basis: None specified
- 57 [40 CFR 63.168(d)(1)] Valves in gas/vapor service or light liquid service (Phase III, 2 percent or greater leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly, as specified in 40 CFR 63.180(b); or implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175 and monitor quarterly. If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). If electing to implement a quality improvement program, follow the procedures in 40 CFR 63.175. Subpart H. [40 CFR 63.168(d)(1)]
Which Months: All Year Statistical Basis: None specified
- 58 [40 CFR 63.168(d)(2)] Valves in gas/vapor service or light liquid service (Phase III, less than 2 percent leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Permittee may elect to comply with the alternate standards in 40 CFR 63.168(d)(3) and (d)(4). Subpart H. [40 CFR 63.168(d)(2)]
Which Months: All Year Statistical Basis: None specified
- 59 [40 CFR 63.168(e)(1)] Valves in gas/vapor service or light liquid service: Determine percent leaking valves using the equation in 40 CFR 63.168(e)(1). Subpart H. [40 CFR 63.168(e)(1)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20090017

Permit Number: 2010-V1

Air - Title V Regular Permit Renewal

FUG 0011 UP - Fugitive Emissions (UP)

- 60 [40 CFR 63.168(f)(3)] Valves in gas/vapor service or light liquid service (after leak repair): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within three months (at least) after repair to determine whether the valve has resumed leaking. Subpart H. [40 CFR 63.168(f)(3)]
Which Months: All Year Statistical Basis: None specified
- 61 [40 CFR 63.168(f)] Valves in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.168(f)]
- 62 [40 CFR 63.168(h)(1)] Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(h)(1)]
- 63 [40 CFR 63.168(h)(2)] Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valves as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Subpart H. [40 CFR 63.168(h)(2)]
Which Months: All Year Statistical Basis: None specified
- 64 [40 CFR 63.168(i)(1)] Valves in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner. Subpart H. [40 CFR 63.168(i)(1)]
- 65 [40 CFR 63.168(h)(3)] Valves in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the valves at least once per calendar year. Subpart H. [40 CFR 63.168(i)(3)]
Which Months: All Year Statistical Basis: None specified
- 66 [40 CFR 63.169(a)] Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) if evidence of a potential leak to the atmosphere is found by visible, audible, olfactory, or any other detection method. If such a potential leak is repaired as required in paragraphs (c) and (d) of this section, it is not necessary to monitor the system for leaks by the method specified in 40 CFR 63.180(b) of this subpart. If a reading of 10,000 ppm for agitators, 5,000 ppm for pumps handling polymerizing monomers, 2,000 ppm for all other pumps (including pumps in food/medical service), or 500 ppm for valves, connectors, instrumentation systems, and pressure relief devices, or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.169(c). Subpart H. [40 CFR 63.169(a)]
Which Months: All Year Statistical Basis: None specified
- 67 [40 CFR 63.169(c)] Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.169(c)]
- 68 [40 CFR 63.170] Surge control vessels and bottoms receivers: Equip with a closed-vent system that routes the organic vapors vented from the surge control vessel or bottoms receiver back to the process or to a control device that complies with the requirements of 40 CFR 63.172, except as provided in 40 CFR 63.162(b), or comply with the requirements of 40 CFR 63.19(b) or (c), if surge control vessel or bottoms receiver is not routed back to the process and meets the conditions specified in 40 CFR 63 Subpart H Table 2 or Table 3. Subpart H.
- 69 [40 CFR 63.173(a)] Agitators in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(a)]
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AJ ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

FUG_0011 UP - Fugitive Emissions (UP)

- 70 [40 CFR 63.173(b)(1)] Each agitator shall be checked by visual inspection each calendar week for indications of liquids dripping from the agitator. [40 CFR 63.173(b)(1)]
- 71 [40 CFR 63.173(b)] Agitators in gas/vapor service or light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar) for indications of liquids dripping from the agitator. If there are indications of liquids dripping from the agitator, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(b)]
 Which Months: All Year Statistical Basis: None specified
- 72 [40 CFR 63.173(c)] Agitators in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.173(c)]
- 73 [40 CFR 63.173(d)(4)] Agitators in gas/vapor service or light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the agitator seal. If there are indications of liquid dripping from the agitator seal at the time of the weekly inspection, monitor the agitator as specified in 40 CFR 63.180(b) to determine the presence of organic HAP in the barrier fluid. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.173(d)(6). Subpart H. [40 CFR 63.173(d)(4)]
 Which Months: All Year Statistical Basis: None specified
- 74 [40 CFR 63.173(d)] Agitators in gas/vapor service or light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the agitator is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.173(d)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.173(d)(6). Subpart H. [40 CFR 63.173(d)]
 Which Months: All Year Statistical Basis: None specified
- 75 [40 CFR 63.173(e)] Agitators in gas/vapor service or light liquid service (unmanned plant site): Presence of a leak monitored by visual inspection/determination at the regulation's specified frequency. Monitor each agitator as often as practicable and at least monthly. Subpart H. [40 CFR 63.173(g)]
 Which Months: All Year Statistical Basis: None specified
- 76 [40 CFR 63.173(h)(1)] Agitators in gas/vapor service or light liquid service (difficult to monitor): Demonstrate that the agitator cannot be monitored without elevating the monitoring personnel more than two meters above a support surface or it is not accessible at anytime in a safe manner. Subpart H. [40 CFR 63.173(h)(1)]
- 77 [40 CFR 63.173(h)(3)] Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the agitator at least once per calendar year. Subpart H. [40 CFR 63.173(h)(3)]
 Which Months: All Year Statistical Basis: None specified
- 78 [40 CFR 63.173(j)(1)] Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the agitator is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(1)]
- 79 [40 CFR 63.173(j)(2)] Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the agitator as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Subpart H. [40 CFR 63.173(j)(2)]
 Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

FUG0011 UP - Fugitive Emissions (UP)

- 80 [40 CFR 63.174(b)(1)] Connectors in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within 12 months after the compliance date, except as provided in 40 CFR 63.174(f) through (h). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(b)(1)]
 Which Months: All Year Statistical Basis: None specified
- 81 [40 CFR 63.174(b)(2)] Connectors in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within the first 12 months after initial startup or by no later than 12 months after the date of promulgation of a specific subpart that references 40 CFR 63 Subpart H, whichever is later, except as specified in 40 CFR 63.174(f) through (h). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(b)(2)]
 Which Months: All Year Statistical Basis: None specified
- 82 [40 CFR 63.174(b)(3)(i)] Connectors in gas/vapor service or light liquid service (0.5% or greater leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Subpart H. [40 CFR 63.174(b)(3)(i)]
 Which Months: All Year Statistical Basis: None specified
- 83 [40 CFR 63.174(b)(3)(ii)] Connectors in gas/vapor service or light liquid service (less than 0.5% leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every two years. Subpart H. [40 CFR 63.174(b)(3)(ii)]
 Which Months: All Year Statistical Basis: None specified
- 84 [40 CFR 63.174(c)(1)(i)] Connectors in gas/vapor service or light liquid service (opened or otherwise had the seal broken): Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 within three months after being returned to organic HAP service or when it is reconnected. If monitoring detects a leak, repair according to the provisions of 40 CFR 63.174(d), as specified, except as provided in 40 CFR 63.174(c)(1)(ii). Subpart H. [40 CFR 63.174(c)(1)(i)]
 Which Months: All Year Statistical Basis: None specified
- 85 [40 CFR 63.174(c)(2)(i)] Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Comply with the requirements of 40 CFR 63.169. Subpart H. [40 CFR 63.174(c)(2)(i)]
- 86 [40 CFR 63.174(c)(2)(ii)] Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Organic HAP monitored by technically sound method within three months after being returned to organic HAP service after having been opened or otherwise had the seal broken. If monitoring detects a leak, implement repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(c)(2)(ii)]
 Which Months: All Year Statistical Basis: None specified
- 87 [40 CFR 63.174(d)] Connectors in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Subpart H. [40 CFR 63.174(d)]
- 88 [40 CFR 63.174(f)(1)] Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with 40 CFR 63.174(a) through (e). Subpart H. [40 CFR 63.174(f)(1)]
- 89 [40 CFR 63.174(f)(2)] The owner or operator has a written plan that requires monitoring of the connector as frequently as practicable during safe to monitor periods, but not more frequently than the periodic schedule otherwise applicable. [40 CFR 63.174(f)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20090017

Permit Number: 2010-V1

Air - Title V Regular Permit Renewal

FUG 0011 UP - Fugitive Emissions (UP)

- 90 [40 CFR 63.174(f)(2)] Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of connectors as frequently as practicable during safe to monitor times, but not more frequently than the periodic schedule otherwise applicable. Subpart H. [40 CFR 63.174(f)(2)]
Which Months: All Year Statistical Basis: None specified
- 91 [40 CFR 63.174(g)] Connectors in gas/vapor service or light liquid service (unsafe-to-repair): Demonstrate that repair personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.174(d) and that the repair would be conducted before the end of the next shutdown. Subpart H. [40 CFR 63.174(g)]
- 92 [40 CFR 63.174(h)(2)] Connectors in gas/vapor service or light liquid service (inaccessible, ceramic, or ceramic-lined): Make a first attempt at repair within 5 days after leak is detected by visual, audible, olfactory or other means, and complete repairs no later than 15 calendar days after leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Subpart H. [40 CFR 63.174(h)(2)]
- 93 [40 CFR 63.174(i)] Connectors in gas/vapor service or light liquid service: Calculate percent leaking connectors as specified in 40 CFR 63.174(i)(1) and (i)(2). Subpart H. [40 CFR 63.174(i)]
- 94 [40 CFR 63.180] Comply with the test methods and procedures requirements provided in 40 CFR 63.180. Subpart H.
- 95 [40 CFR 63.181] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 63.181(a) through (k). Subpart H.
- 96 [40 CFR 63.182(b)] Submit application: Due as soon as practicable before the construction or reconstruction is planned to commence (but it need not be sooner than 90 days after the date of promulgation of the subpart that references 40 CFR 63 Subpart H). Submit application for approval of construction or reconstruction required by 40 CFR 63.5(d) in lieu of the Initial Notification. Subpart H. [40 CFR 63.182(b)]
- 97 [40 CFR 63.182(c)] Submit Notification of Compliance Status: Due within 90 days of the compliance dates specified in the 40 CFR 63 subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(c)(1) through (c)(3). Subpart H. [40 CFR 63.182(c)]
- 98 [40 CFR 63.182(d)] Submit Periodic Reports: Due semiannually starting 6 months after the Notification of Compliance Status, as required in 40 CFR 63.182(c). Include the information specified in 40 CFR 63.182(d)(2) through (d)(4). Subpart H. [40 CFR 63.182(d)]
Comply with 40 CFR 63 Subparts PPP, F, and H in accordance with the streamlining provisions.
- 99 [LAC 33:III.2122] Fugitive emission piping components may be added to or removed from the permitted units, without triggering the need to apply for a permit modification provided all the following are adhered to: a) Changes in components involve routine maintenance or are undertaken to address safety concerns, or involve small piping revisions with no associated emissions increases except from the fugitive emission components themselves; b) Changes do not involve any associated increase in production rate or capacity, or tie in of new or modified process equipment other than the piping components; d) The components are promptly incorporated into any applicable leak detection and repair program.
- 100 [LAC 33:III.507.H.1.a] Implement the HON fugitive emissions LDAR program for ethylene oxide, determined as MACT.
Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retain records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.
- 101 [LAC 33:III.5109.A]
- 102 [LAC 33:III.5113.B.6]

UNF 0007 - Polyols Plant

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

UNF 0007 - Polyols Plant

- 103 [40 CFR 60.1 - 19] All affected stationary sources comply with applicable provisions.
- 104 [40 CFR 60.116b(f)(1)] Determine the highest maximum true vapor pressure for the range of anticipated stored liquid compositions prior to the initial filling of the vessel using the methods described in 40 CFR 60.116b(e). Subpart Kb. [40 CFR 60.116b(f)(1)]
- 105 [40 CFR 61.1 - 19] All affected stationary sources comply with applicable provisions.
- 106 [40 CFR 61.142] Comply with applicable provisions of this subpart.
- 107 [40 CFR 61.Subpart FF] Subpart M - National Emission Standard for Asbestos.
- 108 [40 CFR 63.1 - 15] Subject to recordkeeping and reporting requirements of 40 CFR 61 Subpart FF. Control not required.
- 109 [40 CFR 63.1439] All affected stationary sources comply with applicable provisions.
- 110 [40 CFR 63.162(c)] Comply with monitoring, recordkeeping, and reporting provisions as denoted for affected sources.
- 111 [40 CFR 63.162(f)] Polyols MACT general.
 Identify each piece of equipment in a process unit such that it can be distinguished readily from equipment that is not subject to 40 CFR 63 Subpart H. Subpart H. [40 CFR 63.162(c)]
 Clearly identify leaking equipment, for leaking equipment detected as specified in 40 CFR 63.163, 40 CFR 63.164, 40 CFR 63.168, 40 CFR 63.169, and 40 CFR 63.172 through 63.174. The identification may be removed after the equipment is repaired, except for valves or for connectors subject to 40 CFR 63.174(c)(1)(i). The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 63.175(c)(1)(D), and no leak has been detected during the follow-up monitoring. If electing to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored as specified in 40 CFR 63.174(c)(1)(i) and no leak is detected during that monitoring. Subpart H. [40 CFR 63.162(f)]
 Comply with all applicable regulations in 40 CFR 68 and submit a Risk Management Plan to EPA.
- 112 [40 CFR 68.]
- 113 [LAC 33:III.2113] LAC 33:III.2113 requires best practical housekeeping and maintenance practices reduce the quantity of organic compound emissions. A written plan for housekeeping and maintenance that emphasizes the prevention or reduction of VOC emissions is required.
- 114 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- 115 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.B.
- 116 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 117 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- 118 [LAC 33:III.5107.A.2] Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- 119 [LAC 33:III.5107.A] Submit Annual Emissions Report: Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20090017
Permit Number: 2010-V1
Air - Title V Regular Permit Renewal

UNF 0007 - Polyols Plant

- 120 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 121 [LAC 33:III.5107.B.2] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:I.3923.
- 122 [LAC 33:III.5107.B.3] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931. Submit notification in the manner provided in LAC 33:I.3923.
- 123 [LAC 33:III.5107.B.4] Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- 124 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 125 [LAC 33:III.5109.C] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
- 126 [LAC 33:III.5151] Subchapter M. Emission Standards for Asbestos. Comply with applicable provisions of this Subchapter.
- 127 [LAC 33:III.535] Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]
- 128 [LAC 33:III.919.D] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.
- 129 [LAC 33:III.927] Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.
- 130 [LAC 33:III.Chapter 56] Have standby plans for emissions reduction during emergency episodes.
- 131 [LAC 33:III.Chapter 59] Comply with sections 5901, 5903, 5907, 5910, 5911, and 5913 in accordance with the dates specified in Chapter 59.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant

Activity Number: PER20090017

Permit Number: 2010-V1

Air - Title V Regular Permit Renewal